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Attorney for Plaintiffs/Counter-Defendants,
SIMON CHEFFINS and GREGORY JONES

UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

SIMON CHEFFINS and GREGORY JONES,

Plaintiffs/Counter-Defendants, **CASE NO.: 3:09-cv-00130**

vs.

MICHAEL B. STEWART and DOES I-V
Inclusive,

Defendant/Counter-Plaintiff.

PLAINTIFFS' FIRST SUPPLEMENTAL JURY INSTRUCTIONS

COMES NOW, the Plaintiffs above-named, by and through their counsel, PAUL E. QUADE, ESQ. and QUADE LAW, LTD., and based upon the undersigned's discussions this date with Defendant's counsel, KEEGAN G. LOW, ESQ., concerning the conversion claim, Plaintiff's hereby submit the following proposed First Supplemental Jury Instruction from CACI 2100, related to the Plaintiffs' conversion claim.

Counsel for Plaintiffs hereby request the Court review and consider NRS 487.205 through NRS 487.281, related to the Nevada Abandoned Vehicle Law and the respective duties of the parties. A copy is attached hereto.

DATED this ____ day of **July, 2012**.

QUADE LAW, LTD.

/s/

PAUL E. QUADE, ESQ.
Attorney for Plaintiffs,
SIMON CHEFFINS and GREG JONES

QUADE LAW, LTD.

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CERTIFICATE OF SERVICE

Pursuant to FRCP 5(b), I certify that I am an employee of the LAW OFFICES OF PAUL E. QUADE, P.C., 216 East Liberty Street, Reno, Nevada 89502, and that on this date I caused to be delivered via electronic mail and hand delivery, a true and correct copy of the foregoing addressed as follows:

Keegan G. Low, Esq.
Robison, Belaustegui, Sharp & Low
71 Washington Street
Reno, Nevada 89503

DATED this **24th** day of **July, 2012.**

/s/
Lisa Bailey

Plaintiffs, Simon Cheffins and Gregory Jones, claim that Michael Stewart wrongfully exercised control over their personal property. To establish this claim, Plaintiffs must prove all of the following:

- (1) That Plaintiffs owned, and had a right to possess, the *La Contessa*;
- (2) That Michael Stewart intentionally destroyed the *La Contessa*;
- (3) That Plaintiffs did not consent;
- (4) That Plaintiffs were harmed; and
- (5) That Michael Stewart's conduct was a substantial factor in causing Plaintiffs' harm.

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CONVERSION CACI 2100
CONVERSION - ESSENTIAL FACTUAL ELEMENTS

Instruction No. _____